

**IN THE UNITED STATES DISTRICT COURT  
FOR THE SOUTHERN DISTRICT OF OHIO  
EASTERN DIVISION**

STEPHANIE CLIFFORD AKA STORMY DANIELS	:	Civil Action No. 2:19-MC-47-MHW-KAJ
Plaintiff,	:	Judge: Michael H. Watson
v.	:	Magistrate Judge: Kimberly A. Jolson
DONALD J. TRUMP	:	
Defendant.	:	

---

STEPHANIE CLIFFORD a.k.a. STORMY DANIELS, an individual,	:	Civil Action No. 2:19-CV-00119
Plaintiff,	:	Judge: Michael H. Watson
v.	:	Magistrate Judge: Elizabeth P. Deavers
SHANA M. KECKLEY, et. al.	:	
Defendants.	:	

---

**NOTICE TO THE COURT**

Plaintiff Stephanie Clifford files this Notice to bring to the Court's attention a "NOTICE OF CLERICAL ERROR" by the Central District of California Court Clerk stating that putative judgment creditor Donald J. Trump did not secure a money judgment in *Clifford v. Trump*, Case No. CV 18-06893-SJO (FFMx) (Cal. C.D.). The "NOTICE OF CLERICAL ERROR" is attached as Exhibit A. Below, Plaintiff Clifford also advises the Court that:

1. Plaintiff Clifford obtained a settlement in a lawsuit she filed with this Court for a violation of her civil rights under 42 U.S.C. § 1983 by individual officers and the City of Columbus for false arrest. *Clifford v. Keckley, et al.*, Case No. 2:19-cv-119 (S.D. Ohio).

2. The amount of settlement is a matter of public record, \$450,000.00, and it seems that word of the monies caused two parties: Donald J. Trump and Michael Avenatti to attempt to assert liens over the settlement monies.

3. Donald J. Trump claimed a judgment lien based on a CIVIL MINUTE ORDER that awarded him \$293,052.33 in attorney fees, costs and sanctions from the Central District of California in *Clifford v. Trump*, Case No. CV 18-06893-SJO (FFMx) (Cal. C.D.).

4. Donald J. Trump claimed that the Central District of California's CIVIL MINUTE ORDER was a final judgment eligible for registration as a foreign money judgment under 28 U.S.C. § 1963. See *Clifford v. Keckley*, Case No. 2:19-cv-119 (S.D. Ohio) (the civil rights case); *Clifford v. Trump*, Case No. 2:19-MC-47 (S.D. Ohio) (proceeding to register foreign judgment).

5. As a result of his claims, Donald J. Trump claimed that he was entitled to a lien on Plaintiff Clifford's settlement proceeds. Plaintiff Clifford has objected to those claims.

6. On March 19, 2020, Plaintiff Clifford filed a motion with the Central District of California asserting that the CIVIL MINUTE ORDER was a not final money judgment and the clerk's certification was in error.

7. On April 10, 2020, the Central District of California issued a Notice of Clerical Error, making clear that the CIVIL MINUTE ORDER that Donald J. Trump sought to register in this district "was a Minute Order . . . , entered on 12/11/2018, [and] not a judgment. Therefore, it cannot be certified as a judgment." See Exhibit A.

8. Thus, based on the Central District of California's Notice of Clerical Error, Donald J. Trump **did not secure a money judgment against Plaintiff Clifford and is not entitled to a judicial lien on the settlement proceeds.** Accordingly, the

Notice of Registration of Foreign Judgment, Dkt. No. 43, is without force and effect as there is no underlying foreign judgment. It should be stricken from the record a legal nullity.

9. The other party that claimed an adverse lien on the settlement proceeds—Michael Avenatti—has withdrawn his claim for a lien.

10. There being no adverse party before the Court with a valid judicial lien on the settlement proceeds, this Court should release those proceeds deposited with the Court to Ms. Clifford and her counsel.

Respectfully Submitted,

/s/ Chase A. Mallory  
Chase A. Mallory (0084728)  
Chase@SabolMallory.com  
SABOL MALLORY, LLC  
743 South Front Street  
Columbus, Ohio 43206  
phone: (614) 300-5088  
fax: (614) 636-4545

/s/ Daniel J. Sabol  
Daniel J. Sabol (0081403)  
Dan@SabolMallory.com  
SABOL MALLORY, LLC  
743 South Front Street  
Columbus, Ohio 43206  
phone: (614) 300-5088  
fax: (614) 636-4545

/s/ Guy A. Fortney

---

Clark O. Brewster - OBA #1114 (Admitted Pro Hac)  
Guy A. Fortney - OBA #17027 (Admitted Pro Hac)  
Mbilike Mwafulirwa OBA# 31164 (Pro Hac)  
BREWSTER & DE ANGELIS  
2617 East 21<sup>st</sup> Street  
Tulsa, OK 74114  
(918) 742-2021 - Telephone  
(918) 742-2197 - Facsimile

*Attorneys for the Plaintiff*

**CERTIFICATE OF SERVICE**

I certify that on April 10, 2020 a true and exact copy of the above and foregoing document was served via the Court's CM/ECF filing system to all registered counsel of record.

/s/ Chase A. Mallory